

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANTHONY COULTRIP, ROBERT  
CHENAULT, DAVID HADLEY, DANA  
HIGGS, and BENAIAS ALBARRAN, on  
behalf of themselves and others  
similarly situated,

Plaintiffs,

-against-

PFIZER, INC., et al.,

Defendants.

Index No.: 06 Civ. 09952 (JCF)

**NOTICE OF MOTION TO  
CONSOLIDATE AND FOR LEAVE  
TO FILE CONSOLIDATED AND  
AMENDED COMPLAINT**

AYISHA JETER, on behalf of herself and  
all others similarly situated,

Plaintiff,

-against-

PFIZER, INC.,

Defendant.

Index No.: 06 Civ. 15200 (JCF)

FERNANDO OBLITAS-RIOS, on behalf  
of himself and all others similarly situated,

Plaintiff,

-against-

PFIZER, INC., a California Corporation;  
and DOES 1-100, inclusive,

Defendants.

Index No.: 07 Civ. 04532 (JCF)

PLEASE TAKE NOTICE that upon the accompanying supporting memorandum  
of law and the exhibits annexed thereto, and upon all prior proceedings and pleadings,  
Plaintiffs will move this Court at the United States Courthouse for the Southern District

of New York, 500 Pearl Street, Room 18D, New York, New York, before the Honorable James C. Francis, United States Magistrate Judge, for an Order (1) consolidating the above-captioned cases for all purposes and (2) granting leave to file a consolidated amended complaint.

Dated: January 21, 2011  
New York, New York

Respectfully submitted,  
EMERY CELLI BRINCKERHOFF  
& ABADY LLP

By: /s/ Matthew D. Brinckerhoff  
Matthew D. Brinckerhoff  
Elizabeth S. Saylor  
Adam R. Pulver (*not yet admitted in SDNY*)  
Samuel Shapiro  
75 Rockefeller Plaza, 20<sup>th</sup> Fl.  
New York, New York 10019  
Tel.: (212) 763-5000  
Fax: (212) 763-5001

Charles Joseph  
Michael Palmer  
Daniel Maimon Kirschenbaum  
JOSEPH & HERZFELD, LLP  
233 Broadway, 5<sup>th</sup> Fl.  
New York, New York 10279  
Tel.: (212) 688-5640  
Fax: (212) 688-2548

Christopher Bruce Hitchcock  
HITCHCOCK & CUMMINGS LLC  
757 Third Avenue, 25th Fl.  
New York, New York 10017  
Tel.: (212) 688-3025 x25  
Fax: (212) 688-3040

Christopher A. Seeger  
Christopher M. Van de Kieft  
Stephen A. Weiss  
SEEGER WEISS LLP  
One William Street  
New York, New York 10004  
Tel.: (212) 584-0700  
Fax: (212) 584-0799

Eric B. Kingsley\*  
KINGSLEY & KINGSLEY  
City National Bank Building  
16133 Ventura Boulevard, Suite 1200  
Encino, California 91436  
Tel.: (818) 990-8300  
Fax: (818) 990-2903

Ira Spiro\*  
Gregory N. Karasik  
SPIRO MOSS BARNES LLP  
11377 West Olympic Boulevard, 5th Floor  
Los Angeles, California 90064

James A. Jones\*  
GILLESPIE, ROZEN, WATSKY &  
JONES, P.C.  
3402 Oak Grove Avenue, Suite 200  
Dallas, Texas 75204

Tel.: (310) 235-2468  
Fax: (310) 235-2456

Tel.: (214) 720-2009  
Fax: (214) 720-2291

Steven Lance Wittels  
SANFORD WITTELS & HEISLER, LLP  
950 Third Avenue, 10th Fl.  
New York, New York 10022  
Tel.: (646) 723-2947  
Fax: (646) 723-2948

*Attorneys for Named Plaintiffs except Jeter  
and Oblitas-Rios; FLSA collective action  
members; and California, New York and  
Illinois putative class members*

Daniel A. Osborn  
Adrianne J. Leven  
OSBORN LAW, P.C.  
295 Madison Avenue, 39<sup>th</sup> Fl.  
New York, New York 10017  
Tel.: (212) 725-9800  
Fax: (212) 725-9808  
*Attorneys for Plaintiff Jeter  
and New York putative class members*

Michael D. Singer\*  
Timothy D. Cohelan\*  
J. Jason Hill\*  
COHELAN KHOURY & SINGER  
605 C Street, Suite 200  
San Diego, California 92101  
Tel.: (619) 595-3001  
Fax: (619) 595-3000

Roger R. Carter  
THE CARTER LAW FIRM  
2030 Main Street, 13<sup>th</sup> Fl.  
Irvine, California 92614  
Tel.: (949) 260-4737  
Fax: (949) 260-4754

*Attorneys for Plaintiff Oblitas-Rios  
and California putative class members*

\* Admitted *Pro Hac Vice*